



United States  
Department of  
Agriculture



Cooperative State  
Research, Education,  
and Extension Service

Washington, DC 20210

---

# **CIVIL RIGHTS PROGRAM COMPLIANCE REVIEW GUIDE**

*Research and Extension*

**Cooperative State Research, Education, and Extension Service  
Guide for Civil Rights Review of  
Research and Extension Programs**

**Preamble**

**General**

Cooperative State Research, Education, and Extension Service (CSREES) and its land-grant partners and Agriculture Experiment Stations recognize the importance of diversity and inclusion in the development and implementation of Research and Extension projects and programs. These projects and programs must be handled in a manner that treats every customer and employee with fairness, equality, and respect. This applies to all aspects of the program including identifying needs, setting priorities, allocating resources, selecting and assigning staff, conducting programs, and getting feedback.

Civil Rights reviews, conducted by CSREES, are intended as part of a proactive effort to determine how well Research and Extension programs and services are being delivered to all customers. Reviews are planned and organized jointly between CSREES and the institutions. The review process has flexibility to recognize differing demographic makeup of State partners. Whenever possible, reviews will be conducted on a comprehensive basis with participation from Research and Extension in 1890, 1862, 1994, and Hispanic Serving Institutions, as well as other relevant organizations receiving Research and/or Extension funding.

**Purpose and Relevant Legislation**

Our goal is for all eligible customers to have equal access to all Research and Extension programs and their benefits. The review will focus on those aspects that are covered by the Federal statutes prohibiting discrimination based on race, color, national origin, gender, age, and disability.

Regular systematic compliance reviews are designed to determine whether recipients of U.S. Department of Agriculture (USDA) financial assistance are complying with the provisions of nondiscrimination laws and with the Department's rules, regulations, and procedures for implementing these laws. Specifically, reviews evaluate the effectiveness of recipients' procedures for delivering Research and Extension program benefits to all eligible customers.

CSREES Civil Rights compliance reviews are conducted consistent with the following major statutes and Departmental Regulations:

- Title VI of the Civil Rights Act of 1964, as amended, 42 USC 2000d.
- Section 504 of the Rehabilitation Act of 1973, as amended, 19 USC 794.

- Americans with Disabilities Act of 1990, 42 USC 12101 et. seq.
- Age Discrimination Act of 1975, 42 USC 601 et. seq.
- Title IX of the Education Amendments of 1972, et. seq.
- Civil Rights Restoration Act of 1987, P. L. 100-259, as amended by, Civil Rights
- Restoration Act of 1991, P.L. 102-166.
- USDA DR 4330-2, Nondiscrimination in Programs and Activities Receiving Federal Financial Assistance from USDA, dated March 3, 1999.

The complete list of statutes and Departmental regulations are located on the Department's website: <http://www.usda.gov/da/directives.htm>. The Department of Justice (DOJ) regulations, contained in 28 CFR 42.401, coordinate civil rights compliance activities for USDA programs. DOJ evaluates the Department's compliance operation to determine if the applicable nondiscrimination laws, rules and regulations are being fully implemented. DOJ's compliance regulations are located at website: <http://www.usdoj.gov>. EEO/Civil Rights information on program compliance reviews can also be accessed from the Civil Rights button on the CSREES homepage.

The Office of Civil Rights within the Department of Agriculture is assigned responsibility by the Secretary of Agriculture for conducting compliance reviews of recipients of USDA financial assistance. The Office of Civil Rights develops standards for USDA agencies' civil rights compliance review procedures and reviews agencies proposed directives, guidelines, and procedures.

CSREES is responsible for assuring that its land-grant partners in research, education, and extension are meeting the specific obligations of nondiscrimination and affirmative outreach associated with the USDA civil rights rules and regulations. CSREES reviews program activities on a continuing basis to assess their compliance with the Department's civil rights rules and regulations. CSREES Equal Opportunity Staff (EOS) plan, organize, and conduct such civil rights reviews.

State land-grant partners are responsible for establishing internal policies and guidelines to ensure that Research and Extension programs and operations do not discriminate and that programs are open and available to all eligible persons without regard to race, color, national origin, gender, age, or disability. The States are expected to have available the appropriate documentation, records, and source of information related to the items included in the Research and Extension sections of this guide.

## **Process**

There are a variety of circumstances which may prompt CSREES-EOS to schedule a review of the program practices of a State Research and/or Extension organization to examine how well benefits and services are being delivered.

- CSREES will initiate and conduct civil rights reviews on a systematic basis. The projected schedule will be posted on the CSREES website with a 2-year lead-time whenever possible.
- USDA may direct CSREES to conduct a compliance review.
- The Department of Justice may conduct a review of CSREES Research and Extension partners.
- Reviews may also be requested by a partner institution or initiated by CSREES at any time.

The CSREES reviews will be initiated by the Equal Opportunity Staff contacting the Research and Extension Directors/Administrators in the State to discuss the process, any special issues, and to establish the schedule and locations for the review.

In conducting a compliance review, the CSREES review team will need adequate information about the Research and Extension programs. Such information includes plans of work, which are viewed as the State commitment to carry out Extension and Research programs. Review specialists, in particular instances, may also need specific information pertinent to employment decisions to determine the impact on Research and Extension programs.

The review will seek to gain a comprehensive understanding of what the State Research and Extension programs are doing to insure nondiscrimination in program delivery, how they conduct educational programs for staff on civil rights topics, how they conduct innovative programs, and how they take corrective action when discrimination occurs.

The purpose of the guide is to serve as a tool that identifies the extent of full implementation and compliance with the various USDA regulations. It provides the opportunity for the presentation of specific program accomplishments from the various Research and Extension programs. The format includes both quantitative and qualitative information. Moreover, it offers the opportunity for comments and explanations to better reflect accomplishments. All statements made and data cited by Research and Extension should be based upon verifiable records and/or documentation at the Agricultural Experiment Stations, and State and local Extension offices.

The following sections identify the basic components and the process for a review. Note that there is a section specific to Research and another specific to Extension.

## **Areas for Review for Research Programs**

### **1. Resource Allocation**

Assess the extent to which resources for supporting research have been allocated on an equitable and nondiscriminatory basis.

- a. Identify the process by which research projects are selected to receive funding. A written description of the process should be easily available to all potential recipients of research funds (availability might be achieved by a regular distribution through e-mail or in hard copy or by posting on a website).
- b. If the process for selecting research projects includes review or selection by a committee, identify criteria/considerations used to select members of the committees. Provide best available data on current members by race, ethnicity, and gender. Describe recent efforts to achieve and maintain diversity in these groups.
- c. Identify the criteria/considerations used to determine start-up packages provided for researchers. Those who establish the amount for start-up packages are encouraged to make periodic reviews of those awards to assure the criteria/considerations are used consistently.
- d. Identify criteria/considerations used to allocate laboratory and research facilities/space/equipment, and to allocate support staff (technicians, secretaries, and others) to researchers.
- e. Identify mentoring programs for new faculty and staff including how mentors are selected and assigned and efforts to assure appropriate mentoring for each faculty and staff member.
- f. Identify criteria/considerations used to select members for advisory and stakeholder groups. Provide best available data on current members by race, ethnicity, and gender. Identify efforts that have been made to achieve and maintain diversity in these groups.
- g. Identify existing stakeholder and advisory groups with which administrators and faculty most often interact and potential advisory groups with which there is seldom or never interaction. Identify reasons for the limited interaction with the latter.

- h. Describe how interactions with these groups meet the organization's civil rights responsibilities to insure that all, including traditionally underserved groups, have opportunities for identifying research needs. Describe efforts to involve new and more diverse sources of input for determining research needs.

## **2. Graduate Students**

Graduate Students often serve an integral role in CSREES funded research projects. Assess the following graduate student related data for each appropriate administrative and functional unit receiving CSREES research funding such as departments, colleges, and Experiment Stations. Include historical trends to the extent data is available.

- a. Identify methods used to recruit graduate students. Identify how traditionally under-represented students have been reached.
- b. Review data on gender, race, and ethnicity of current graduate students. Distinguish between domestic and international students.
- c. Review attrition and completion rates of graduate students by race, ethnicity, and gender including those who come for a PhD but leave with less than a terminal degree.
- d. Identify methods used to notify graduate students of available scholarships and awards, and describe the process for selecting recipients, including how the needs for diversity are addressed.
- e. Describe the process for awarding graduate assistantships and how funds are allocated.
- f. Describe how graduate students are assigned to research projects.
- g. Describe efforts to advise graduate students of local resources and to assist them in identifying relevant supportive communities--especially women and minority students.

## **3. Employment**

All components of the university, college, department, and agency are subject to equal employment opportunity laws prohibiting discrimination on the basis of race, color, national origin, religion, age, gender, and disability. Statutes pertinent to programs receiving Federal financial assistance also prohibit employment discrimination if it is a pattern and practice, and/or if it is having an adverse impact in the delivery of the programs.

- a. Examine the employment profile of Experiment Station employees (as defined by each State) according to current United States Department of Labor or comparable categories. Use the profile as a basis for discussion of employment issues and their possible impact on program delivery. Consult the university's equal opportunity/affirmative action office for U.S. Department of Labor's employment profiles that are relevant to the Experiment Station.

#### **4. Professional Development and Promotion**

Professional development enhances a person's qualifications for promotions and job opportunities. Assess the extent to which professional development opportunities are equally accessible to all faculty and staff.

- a. Review university policies and procedures to assure equal accessibility and opportunity for faculty and staff to participate in professional development, upward mobility, and career enhancement activities.
- b. Determine faculty and staff's awareness of policies and procedures relating to professional development and promotion and the extent to which the policies and procedures have been implemented and used by faculty and staff.

#### **5. Civil Rights and Diversity Training for Faculty and Staff**

The institution is responsible for helping faculty and staff to understand civil rights laws, rules, regulations, policies, and procedures, and to value diversity and inclusion within the organization. Assess the extent to which this is being accomplished.

- a. Determine availability and frequency of training events and opportunities for faculty and staff on diversity and civil rights laws, rules, regulations, policies, and procedures.
- b. Identify the extent to which faculty and staff have participated in civil rights training.
- c. Determine the availability to employees of essential civil rights information and material. (Such a file or web page could include civil rights evaluation plans, lists of applicable statutes, CSREES and university policies, prior civil rights review findings, etc.).
- d. Determine faculty and staff familiarity with the applicable Federal civil rights laws, rules, regulations, policies, and procedures.
- e. Determine faculty and staff familiarity with content, location, and availability of applicable university policies and procedures concerning civil rights and diversity.

## **6. Internal Evaluation Plan of Civil Rights Activities**

Most institutions and organizations have developed an internal evaluation plan to delineate civil rights policies and procedures and to assess compliance with them.

- a. Determine the extent to which an annual evaluation plan has been developed and implemented. Interview appropriate faculty and staff to determine if there has been periodic internal review of the plan, and if faculty and staff have been given the opportunity to review and comment on the plan.
- b. Review internal and external communications regarding civil rights and diversity issues to determine if there has been periodic communication between equal opportunity (EO) and Deans, Directors, and department heads.
- c. Review methods for identifying problem areas and developing plans to improve accessibility to research programs and facilities.
- d. Determine if there are innovative programs in place to reach under-represented and under-served groups.
- e. Verify that there are procedures in place for persons to file a civil rights complaint.

## **7. Public Notification**

The institution is responsible for informing the public, including traditionally underrepresented and underserved groups, of the institution's responsibilities regarding civil rights. Assess the extent to which this is being accomplished.

- a. Review written policy statement, objectives of evaluation plan, and procedures for informing the public of CSREES' and State's responsibilities regarding Civil Rights laws, rules, regulations, policies, and procedures.
- b. Verify that the USDA "And Justice for All" poster showing the nondiscrimination policy statement and how to file a civil rights complaint is properly displayed in areas of institutional facilities visited by the public, and verify that this information is printed on all publications.
- c. If applicable, verify that the institution's civil rights policy statement has been distributed to organization and union officials representing faculty and staff.



## **8. Accessibility to Programs and Facilities**

The institution is responsible for making its programs and facilities accessible to all current and potential customers and employees. Assess the extent to which this is being accomplished.

- a. Identify efforts taken to eliminate barriers for people with disabilities as required by Section 504 of The Rehabilitation Act. (Examples include, providing programs in accessible facilities, providing sign language interpreters, inviting individuals with disabilities to request reasonable accommodation, providing information/research results in alternative formats when requested. Include accomplishments reported under the Americans with Disabilities Act's (ADA's) Self-Evaluation Plan, where relevant.)
- b. Identify efforts to provide relevant research results and other information to people with Limited English Proficiency (LEP).
- c. Identify efforts that have been made to disseminate relevant research results and other information to people from traditionally underserved populations such as women, people of color, and individuals with disabilities, women, and people of color.
- d. Identify the process for maintaining and updating contact lists and efforts made to increase the racial, ethnic, and gender diversity on these lists.

Draft # 2, Page 8 of 18-March 3, 2003  
**Areas for Review for Extension Programs**

| AREA  | STANDARDS  | REVIEWER WILL  | STATE WILL   | FINDINGS | RECOMMENDATIONS<br>CORRECTIVE ACTION |
|---|--|--|--|----------|--------------------------------------|
| <b>1. Knowledge of Laws, Rules, and Regulations</b>                   | <p>a. All staff members are expected to be knowledgeable and skilled in implementing equal opportunity requirements in Extension programs.</p> <p>b. Job descriptions and/or equal opportunity policy statement contain duties and responsibilities for implementing equal opportunity regulations.</p> <p>c. Staff members are placed in positions and provided functional assignments which do not limit them to work with customers of the same race and gender. Programs and services are provided across race and gender lines.</p> <p>d. Training is provided for all staff to gain knowledge on the implementation of nondiscrimination requirements.</p> | <ul style="list-style-type: none"> <li>• Determine the extent to which staff members are knowledgeable and skilled in the implementation of the objectives of equal opportunity regulations relative to the consideration and treatment of customers for participation in Extension programs regardless of their race, color, national origin, sex, age, or disability.</li> <li>• Review job descriptions and assignments and interview staff to determine if employees are limited to working in subject matter or geographical areas which tend to maintain a strict racial identity between the employees and minority customers.</li> <li>• Review a representative sample of minority and non-minority staff members weekly activity reports or printout of each agent contact participation data to determine the extent which services are provided across race and gender lines.</li> </ul> | <ul style="list-style-type: none"> <li>• Provide a copy of the civil rights plan for the State Extension program.</li> <li>• Provide notification to staff in program locations for the impending review and expected dates to be cleared to work with the reviewers.</li> <li>• Provide a list of Extension personnel by locations with names, race, gender, title, and program area of assignments.</li> <li>• Make position descriptions available to the reviewers, for their review.</li> </ul> |          |                                      |
| <b>2. Procedure for processing program discrimination complaints.</b> | <p>a. Sound standards of due process for program complaints are established for customers and ensures the fair treatment where discrimination is alleged.</p> <p>b. Published complaint procedures are available to all employees, volunteers, and to the public. All staff members and volunteers have received training in program complaint concerns.</p>   | <ul style="list-style-type: none"> <li>• Interview staff to determine their knowledge of program and employment complaint procedures.</li> <li>• Review records to determine the prompt, fair, and impartial processing of complaints, including the adequacy of complaint procedures.</li> </ul>  | <ul style="list-style-type: none"> <li>• Provide a copy of State Extension program complaint procedures.</li> <li>• Provide access to complaint receipts and dispositions, including any current complaints.</li> <li>• Provide name of contact person for the Director/Administrator's office handling complaints.</li> </ul>   |          |                                      |

Draft # 2, Page 9 of 18-March 3, 2003

| AREA  | STANDARDS  | REVIEWER WILL  | STATE WILL   | FINDINGS | RECOMMENDATIONS<br>CORRECTIVE ACTION |
|---|--|--|--|----------|--------------------------------------|
| 2. ...continued                               | <p>c. Staff members understand the complaint process and those issues of compliance and noncompliance.</p> <p>d. Staff members and volunteers, understand the bases on which program discrimination is prohibited in Extension programs.</p>   | <ul style="list-style-type: none"> <li>Determine the extent to which Extension staff members, leaders, clientele, and the general public are informed of the procedures for filing program and/or employment complaints.</li> </ul>  |  |          |                                      |
| 3. Statewide Equal Opportunity/Diversity Plan | <p>a. A State plan is in place which insures that educational benefits are provided to a diverse audience of the State on a nondiscriminatory basis.</p> <p>b. Plan expresses the organization's intent to maintain compliance with equal opportunity non-discrimination rules and regulations applicable to Extension programs.</p> <p>c. Plan clearly states the organization's commitment in valuing diversity within its staff, volunteers, and citizens.</p> <p>d. Plan describes how it will secure and utilize citizen input through lay committees (include all collaborative boards used to determine clientele needs) on program priorities and needs assessments. Lay committees will be diverse and reflect the diversity in the communities being served.</p> | <ul style="list-style-type: none"> <li>Determine technical sufficiency of equal opportunity requirements.</li> <li>Determine the extent to which educational methods used are accessible to all interested customers including outreach to individuals, groups, and communities not being served or underserved. Examine plans and procedures for publicizing and encouraging attendance or enrollment in Extension programs and activities.</li> <li>Determine if Extension provides assistance to any organization that excludes any individual from participation because of their race, color, national origin, or disability.</li> <li>Determine the extent to which the membership of each committee reflects the racial composition of the community or area which is served by Extension staff members.</li> <li>Determine if Extension maintains a review and evaluation system for measuring the overall status of compliance by employees.</li> </ul> | <ul style="list-style-type: none"> <li>Provide a copy of the Civil Rights Plan for the State program.</li> </ul> |          |                                      |

| AREA   | STANDARDS  | REVIEWER WILL   | STATE WILL  | FINDINGS | RECOMMENDATIONS<br>CORRECTIVE ACTION |
|--|--|---|---|----------|--------------------------------------|
| 3. ... continued                                 | <p>e. Plan identifies the frequency of conducting internal civil rights reviews with all program units, including plans for taking appropriate corrective measures, and Extension's recognition of staff members successes in addressing equal opportunity issues.</p> <p>f. Plan includes written policy and procedures for informing the public of the University and Extension's responsibility for implementing the requirements for equal opportunity.</p> <p>g. Established procedures guide staff in insuring that education assistance is not provided to any organization or group that excludes individuals because of their race or gender.</p> |   |   |          |                                      |
| 4. Staff Training                                | <p>a. Extension civil rights plan includes written procedures for staff members participation in equal opportunity/diversity training. Training information is disseminated annually to all staff members.</p> <p>b. Annual educational events such as in-service training programs and/or orientation programs for new staff members addresses equal opportunity requirements.</p>  | <ul style="list-style-type: none"> <li>• Review staff development plan and interview staff members to determine equal access and opportunity to participate in training program for professional improvement.</li> <li>• Review staff conference plans and proceedings, training agenda(s), training opportunity announcements, and interview staff members to determine the extent to which civil rights matters were included in these sessions.</li> </ul> | <ul style="list-style-type: none"> <li>• Provide a copy of the State employee's staff development plan, including State procedures for staff to participate in training.</li> </ul> |          |                                      |
| 5. Mailing Lists (Electronic and Non-Electronic) | <p>a. Established written instructions guide staff members on the maintenance and use of clientele mailing lists.</p> <p>b. The various mailing lists are representative of the diversity of the population in the geographic areas being served.</p>  | <ul style="list-style-type: none"> <li>• Review instructions on the maintenance and use of mailing lists. Review the makeup of mailing lists and determine that racial/ethnic minorities and both sexes are appropriately included.</li> </ul>  | <ul style="list-style-type: none"> <li>• Provide policy statements and procedures dealing with mailing lists their use and protection.</li> </ul>                                   |          |                                      |



| AREA  | STANDARDS   | REVIEWER WILL   | STATE WILL  | FINDINGS | RECOMMENDATIONS<br>CORRECTIVE ACTION |
|---|---|---|---|----------|--------------------------------------|
| 5 ... continued   | c. Racial minority group members are on the mailing lists.  |   |   |          |                                      |
| 6. Office Facilities  | <p>a. There is equality, fairness, and respect in the use of Extension work facilities, including support for educators, paraprofessionals, secretarial and support staff in the dissemination and use of office equipment.</p> <p>b. Office quarters and related facilities are assigned and available to all staff on a nondiscriminatory basis.</p> <p>c. Supplies, educational materials, electronic technology (computers, telephones, etc.) are available to all staff on a nondiscriminatory basis.</p> <p>d. Office entrances, routing of clients are such that discrimination on the basis of race, color, national origin, sex, age, or disability does not occur.</p> <p>e. Secretarial help and other support resources are available on a nondiscriminatory basis.</p> <p>f. Work facilities are consistent with rehabilitation regulations and are fully accessible to disabled people.</p> | <ul style="list-style-type: none"> <li>• Reviewer will determine if Extension work facilities are fully accessible to disabled people.</li> <li>• Determine if office space and the use of equipment and office supplies are done in a nondiscriminatory manner.</li> </ul>   | <p>As appropriate, provide policy statements on:</p> <ul style="list-style-type: none"> <li>• accessibility of physical facilities that employees, customers, or visitors are expected to use;</li> <li>• use of office equipment, supplies, etc. for educational presentations;</li> <li>• assignment of office space for employees</li> </ul> |          |                                      |
| 7. Extension Staff Members Assigned in Areas being Reviewed | <p>a. Position assignments of employees provides opportunity for them to work with all persons, regardless of race, gender, age, color, or disability.</p> <p>b. Secretarial and clerical employees are not limited to working with members of the same race.</p>   | <ul style="list-style-type: none"> <li>• Determine if staff members are placed in positions and provided functional assignments which do not limit them to work exclusively with customers or employees of their own race.</li> <li>• Determine if staff members are not limited to working in subject matter or geographical areas which tend to maintain a strict racial identity between staff members and customers.</li> </ul> | <ul style="list-style-type: none"> <li>• Provide a listing of staff members by title, program assignments, race, and gender for the counties being reviewed.</li> </ul>   |          |                                      |

| AREA                     | STANDARDS  | REVIEWER WILL  | STATE WILL   | FINDINGS | RECOMMENDATIONS<br>CORRECTIVE ACTION |
|--------------------------|--|--|--|----------|--------------------------------------|
| 7. ...continued          | c. Minority hiring is not limited to filling vacancies created by the departure of other minority Extension employees.   | <ul style="list-style-type: none"> <li>• Review present position assignments of secretarial and clerical staff to determine if they work across racial/gender lines.</li> <li>• Review previous staffing changes to determine if a pattern of employment exists whereby minorities are replacing minorities.</li> </ul>  |  |          |                                      |
| 8. Program Accessibility | <p>a. Formulated plan insures that Extension education benefits are provided to the citizens of the State on a nondiscriminatory basis.</p> <p>b. Work facilities and programs are accessible to disabled employees, customers, clients, and visitors.</p> <p>c. A self-evaluation conducted to provide an assessment of those program and work facilities that must be made fully accessible to disabled people.</p> <p>d. Where program delivery methods is by club:</p> <ul style="list-style-type: none"> <li>• In cooperation with Extension staff members, clubs are responsible for their own public notification efforts, i.e., existence of the club, dates, time, and location of organizational meetings.</li> <li>• In cooperation with Extension staff members, clubs are responsible for inviting all potential members without regard to race, ethnicity, or gender.</li> </ul> | <ul style="list-style-type: none"> <li>• Determine for each major Extension subject matter program (e.g., agriculture, nutrition, food safety, etc.) the total number of persons by race who are potential recipients of Extension programs and whether these programs are fully accessible to all people.</li> <li>• Determine if equal access exists in all aspects of Extension programs, and the delivery of service are being implemented in a nondiscriminatory manner.</li> <li>• Determine the major programs of the State Extension program. For each program, the reviewer will determine compliance efforts and accomplishments.</li> <li>• Determine through record reviews, circular letters, newspaper articles, membership rolls, program participation data, and interviews with county and district staff members, whether there is nondiscrimination on the basis of race, color, national origin, gender, age, or disability in the administration of educational programs and activities.</li> </ul> | <ul style="list-style-type: none"> <li>• Provide information on steps taken to eliminate barriers and make programs and facilities more accessible to disabled people.</li> <li>• Provide name(s) of person(s) responsible for ensuring that programs are fully accessible to disabled people.</li> <li>• Provide copy of a self-evaluation plan for determining program and facility accessibility for disabled audiences.</li> <li>• Provide a list of all programs disseminated by county staff (traditional, non-traditional, new/innovative, and grant-based program s.)</li> <li>• Provide guidance procedures used by Extension and names and information of the club/group. Include: <ul style="list-style-type: none"> <li>• Public Notification efforts</li> <li>• Outreach Procedures</li> <li>• Diversity levels by race, ethnicity, and gender</li> </ul> </li> </ul> |          |                                      |

| AREA            | STANDARDS   | REVIEWER WILL  | STATE WILL  | FINDINGS | RECOMMENDATIONS<br>CORRECTIVE ACTION |
|-----------------|---|--|---|----------|--------------------------------------|
| 8. ...continued | <ul style="list-style-type: none"> <li>• Extension staff members have communication with club members, officers, leaders, and volunteers regarding the value of diversity and the expectations for equal opportunity requirements.</li> <li>• Equal opportunity requirements will apply to any setting where clubs meet collectively within a county, region, state, or nationally.</li> <li>• Club officers and volunteer leaders are provided written guidelines on equal opportunity requirements. Volunteers are expected to affirm and note an assurance statement of nondiscrimination.</li> <li>• The membership of all clubs operating in interracial and noninterracial communities are open to all individuals regardless of race and gender.</li> <li>• All reasonable efforts are carried out to insure equal access and integration of clubs.</li> <li>• Geographic boundaries established for program planning and implementation are done in a nondiscriminatory manner.</li> <li>• Membership in all clubs is open to both males and females.</li> <li>• 4-H recruitment committees are diverse by race and gender.</li> <li>• Camp participants, including resident instructors are diverse by race, ethnicity, and gender.</li> </ul> | <ul style="list-style-type: none"> <li>• Determine what steps are taken, by responsible officials, to eliminate barriers for disabled people to fully participate in Extension programs.</li> <li>• Determine if reasonable accommodations are being made for the known eligible disabled customers to participate in Extension educational programs.</li> <li>• Identify person/persons assigned leadership for the director/administrator's office to carry out the responsibilities for rehabilitation regulations.</li> <li>• Where program delivery is by club or identifiable group that meets through the year such as Extension Homemakers, Family Community Education, 4-H, Master Gardners, Farm Management groups, pesticide scouting, the Expanded Food and Nutrition Education Program, etc., the following should be reviewed: <ul style="list-style-type: none"> <li>• Review data on the total number of clubs and membership by race, the number of clubs in interracial communities and membership by race and the number of clubs in non-interracial communities and membership by race.</li> </ul> </li> <li>• Review records of the extent to which "all reasonable efforts" have been made to integrate groups serving interracial communities.</li> </ul> | <ul style="list-style-type: none"> <li>• Provide club participation data by race, ethnicity, and gender with geographic breakdown.</li> <li>• Provide information and data by race, ethnicity, and gender on 4-H committees' outreach recruitment efforts to increase the enrollment of underrepresented youth in clubs.</li> </ul> |          |                                      |



| AREA   | STANDARDS   | REVIEWER WILL  | STATE WILL  | FINDINGS | RECOMMENDATIONS<br>CORRECTIVE ACTION |
|--|---|--|---|----------|--------------------------------------|
| 8. ...continued                                    |   | <ul style="list-style-type: none"> <li>• Review the geographic boundaries of groups to determine whether they are established based on race.</li> <li>• Review to the extent to which group participation and membership is open to males and females with respect to "Title IX, Nondiscrimination on the Basis of Sex." including any recognition program.</li> <li>• Review the records to determine the extent to which the 4-H recruitment committee have functioned to increase minority participation in the program and related activities including, enrollment in 4-H clubs.</li> <li>• Review and evaluate audience participation in 4-H camps or other resident workshops. Determine if housing at 4-H camps are integrated by race.</li> </ul> |   |          |                                      |
| 9. Internal Compliance Reviews                     | a. Internal civil rights review plans are in place for assuring program compliance by Extension staff members, on an equal opportunity basis.   | <ul style="list-style-type: none"> <li>• Review written policy and procedures for the conducting of internal compliance reviews.</li> <li>• Review compliance review records and reports for technical sufficiency, findings, recommendations, and follow-up.</li> <li>• Review latest civil rights compliance review.</li> </ul>  | <ul style="list-style-type: none"> <li>• Provide policy statements and copy of Extension instrument for conducting internal reviews.</li> <li>• Provide a copy of the review plan and schedule of reviews conducted and planned.</li> <li>• Provide a copy of the results of the internal civil rights review and follow-up action by State Extension officials.</li> </ul> |          |                                      |
| 10. Title IX-Nondiscrimination on the Basis of Sex | <p>a. Extension programs, methods, content, and places of services are implemented in a manner that insures nondiscrimination on the basis of sex for all participants.</p> <p>b. Extension in providing benefits or services to customers does not, on the basis of sex:</p> | <ul style="list-style-type: none"> <li>• Determine the process through which administrative guidelines for implementation of Title IX, Nondiscrimination on the Basis of Sex, were issued, and the extent which the guidelines are being implemented and consistently followed.</li> </ul>   |   |          |                                      |

| AREA  | STANDARDS   | REVIEWER WILL   | STATE WILL  | FINDINGS | RECOMMENDATIONS<br>CORRECTIVE ACTION |
|---|---|---|---|----------|--------------------------------------|
| <b>10. Title IX Nondiscrimination on the Basis of Sex</b> | <p><u>Treat</u> one person differently from another in meeting any requirement or condition for Extension, benefit, or service provided;</p> <p><u>Provide</u> different benefit or service, or provide them in a different manner;</p> <p><u>Deny</u> any person any such benefit or service;</p> <p><u>Subject</u> any person to separate or different rules of behavior, sanctions, or other treatment;</p> <p><u>Discriminate</u> against any person in the application of any rules of appearance;</p> <p><u>Segregate</u> any person on the basis of sex in the receipt of such benefit or service;</p> <p><u>Give</u> preference to one person over another, by ranking persons separately, or otherwise;</p> <p><u>Apply</u> numerical limitations upon the number or proportion of persons of either sex.</p> <p>c. Removal and elimination of sex-stereotype language, and illustrations, from Extension publications, educational materials, promotional literature, forms, announcements, brochures, and other documents.</p> | <ul style="list-style-type: none"> <li>• Determine if any programs and/or recognitions are sex separate.</li> <li>• Determine if sex separate activities, contests, or awards in Extension programs and related events.</li> </ul>                              | <ul style="list-style-type: none"> <li>• Provide policy and procedures for ongoing implementation of the objectives of Title IX.</li> </ul>           |          |                                      |
| <b>11. Ongoing Administration of Programs</b>             | <p>a. Persons with leadership responsibility in the civil rights area receive administrative support and direction sufficient to maintain a high level of visibility for compliance with civil rights laws, rules, and regulations.</p>   | <ul style="list-style-type: none"> <li>• Determine the administrative structure currently in place to carry out Extension programs. Gain an understanding of the formal and informal lines of authority and responsibility for civil rights matters.</li> </ul> | <ul style="list-style-type: none"> <li>• Provide organizational chart, contact lists, vacancy announcements, and supporting documentation.</li> </ul> |          |                                      |

| AREA   | STANDARDS   | REVIEWER WILL   | STATE WILL   | FINDINGS | RECOMMENDATIONS<br>CORRECTIVE ACTION |
|--|---|---|--|----------|--------------------------------------|
| 11. ...continued   |   | Review: <ul style="list-style-type: none"> <li>• Organizational Chart</li> <li>• Civil Rights Policy Statement</li> <li>• Names of persons responsible for civil rights</li> <li>• Communication structure for the system</li> <li>• Funding source</li> <li>• Reviewer will determine the extent to which persons with leadership responsibility in the civil rights area are receiving administrative support and direction for compliance with civil rights laws, rules, and regulations.</li> </ul> | <ul style="list-style-type: none"> <li>• Provide documentation of efforts, i.e., meetings, guidelines, directives, etc. from the Extension director and/or administrator.</li> </ul>   |          |                                      |
| 12. Staff Conferences  | a. Periodic meetings at the county, regional, and state levels reflect discussions regarding civil rights compliance and civil rights planning.   | <ul style="list-style-type: none"> <li>• Reviewer will determine if staff conferences are held periodically, for determining the status of civil rights implementation and compliance in Extension programs.</li> </ul>   | <ul style="list-style-type: none"> <li>• As appropriate, State will provide relevant copies of agenda, information, reports, etc. of meetings.</li> </ul>  |          |                                      |
| 13. Interaction of 1862 and Minority Land-Grant Institutions | a. Establishing, where appropriate, a mutually developed, coordinated, implemented comprehensive program of Extension work.<br><br>b. Maintain a forum for continuing mutual consultation among top officials of the institution. | <ul style="list-style-type: none"> <li>• Review the working relationships and administrative structure for civil rights concerns.</li> <li>• Determine if there is planned interactions between the institutions, including a review of areas where minority institutions are participating effectively in Extension work.</li> </ul>   | <ul style="list-style-type: none"> <li>• Provide copy of Memorandum of Understanding</li> <li>• Provide listing of committee and membership with identification of participation from 1862 and minority institutions</li> <li>• Provide a listing of joint Extension programs being carried out by the institution.</li> </ul> |          |                                      |

| AREA  | STANDARDS   | REVIEWER WILL  | STATE WILL  | FINDINGS | RECOMMENDATIONS<br>CORRECTIVE ACTION |
|---|---|--|---|----------|--------------------------------------|
| <b>14. Extension Program Participation Data</b> | <p>a. Establish and maintain a system for collecting and reporting data on clientele participation in Extension programs.</p> <p>b. The data system obtains racial data on all significant aspects of program participation.</p> <p>c. Data collection system provides for identification of eligible population and ensures delivery of program benefits to minority and nonminority customers.</p>  | <ul style="list-style-type: none"> <li>• Determine the total number of persons by race who are potential Extension customers. Determine the percentage of potential customer attributable to each racial group.</li> <li>• Determine the total number of actual customers by racial group members. And, the percentage of actual participants by racial group members.</li> <li>• Determine whether any racial group's percentage of actual participants is less than its percentage of potential customers. Reviewer will determine the extent to which disabled people and elderly (senior citizens) individuals are receiving the benefits of Extension programs and services.</li> </ul> | <ul style="list-style-type: none"> <li>• Provide plans and procedures for program participation data and information collection in the State Extension system.</li> <li>• Provide copies of report reflecting program participation data, including club/group enrollment/membership by race and sex.</li> <li>• As appropriate, provide copies of program information reports evaluating clientele participation and the extent of conformance to equal opportunity objectives.</li> <li>• As appropriate, provide copies of information reports and/or program participation on data on disabled and elderly customer participation in Extension programs.</li> </ul> |          |                                      |
| <b>15. Public Notification</b>                  | <p>a. A public notification policy is in use informing the public, particularly minorities and the underrepresented/underserved, of all Extension program benefits and of the protection against discrimination.</p> <p>b. A nondiscrimination statement is used on Extension printed publications, including bulletins, leaflets, circulars, fact sheets, program announcements, and miscellaneous publications.</p> <p>c. The USDA "And Justice for All" poster showing the nondiscrimination policy statement and how to file a civil rights complaint is properly displayed in areas of institutional facilities visited by the public.</p> | <ul style="list-style-type: none"> <li>• Examine the extent to which Extension staff members are informing the public of equal access to Extension programs and activities.</li> <li>• Verify the use of a nondiscrimination statement on printed publications.</li> <li>• Examine notification statement(s) staff members use with newspaper, news releases, radio/television programs, etc., that communicate nondiscrimination requirements.</li> <li>• Verify the use of the "And Justice for All" poster.</li> </ul>  | <ul style="list-style-type: none"> <li>• Provide a copy of official nondiscrimination statement used on printed publications.</li> <li>• As appropriate, provide a copy of public notification plans and procedures.</li> </ul>   |          |                                      |

